

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

VLADISLAV KLYUSHIN,

Defendant

Crim. No. 1:21-cr-10104-PBS

ASSENTED-TO MOTION FOR EXCLUSION OF TIME UNDER  
THE SPEEDY TRIAL ACT

The United States of America, by and through Assistant United States Attorneys Seth B. Kosto and Stephen Frank, respectfully moves this Court to exclude the time period from April 12, 2022, the date of the interim status conference in this matter, through and including the date of the parties' next status conference, May 10, 2022, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), on the grounds that the ends of justice served by excluding this period outweigh the best interests of the public and the defendant in a speedy trial. In support of this request, the government states it produced substantial automatic discovery on or about February 2, 2022; has supplemented that discovery in the interim by processing and re-producing files in a format that is more accessible to the defendant and his counsel; counsel for the defendant has made additional informal discovery requests and expects to make additional requests in the next two weeks, to which the government will respond. Thus, the time period from the April 12, 2022 status conference to the parties' next status conference on May 10, 2022, 2022 is a period of time that constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial

Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Seth B. Kosto  
SETH B. KOSTO  
STEPHEN E. FRANK  
Assistant United States Attorney

April 15, 2022

CERTIFICATE OF SERVICE

I certify that this document was filed on the date listed below through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

*/s/ Seth B. Kosto*  
SETH B. KOSTO  
Assistant United States Attorney

Dated: April 15, 2022